

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

JILL KILEY, et al.,

Plaintiffs,

vs.

**MEDFIRST CONSULTING
HEALTHCARE STAFFING, LLC.,**

Defendant.

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Civil Action No.:

2:17-cv-01756-RDP

DECLARATION OF KRISTI VAUGHN

I, Kristi Vaughn, do hereby swear, affirm and attest as follows:

1. I am over 18 years of age and competent to testify to the matters stated in this declaration. I make this declaration based upon my personal knowledge.

2. I have worked as an independent contractor for MedFirst intermittently since 2010 or 2011. I work with MedFirst on a project-by-project basis. I have also worked as an independent contractor for one other Go-Live company on a project-by-project basis.

3. I am a Registered Nurse (RN) and am a certified OR Tech. I currently work full-time as a RN. Through my work as an RN and with Electronic Medical Records charting I have gained knowledge on the following software: Cerner, Encounter-Pro and Medysis. I also have some experience with McKesson.

4. I learned about MedFirst through my sister who is also an RN and told me that MedFirst was recruiting for a big project. I reached out to MedFirst and was assigned to the project as an independent contractor. I did not receive any training from MedFirst, but I had knowledge of Cerner based on my work experience. The client provided orientation and training on their computer systems and set up a "sandbox" (computers linked to the clients systems which would allow the Consultants to review and become familiar with their systems). Since then, I have worked with MedFirst in many different states on numerous projects.

5. When a project is available, MedFirst will send out an email to Consultants describing the project. Whether I accept or decline a project largely depends on my availability.

6. Projects vary in length depending on the size of the of the facility performing the go live. The longest I have worked on a project was approximately 4 weeks and my shortest project was about a week and a half.

7. Each project requires a different number of Consultants as well. There is no standard-sized project. I have worked on large projects, such as the Albert Einstein Medical Center in Pennsylvania, which had 300-400 Consultants on the project. I have also worked on smaller projects, such as one in Delaware, which had only 50 Consultants. It all depends on the scope of the project.

8. MedFirst flies Consultants to the project locations, makes hotel reservations, and instructs Consultants where and when to report for the first day. Before a project starts, MedFirst provides Consultants with information regarding project logistics but does not instruct us on how to do the work itself.

9. I sometime bring my own tools with me to a project, including my laptop. I always bring my cellphone with me to a project.

10. The client usually provides an orientation regarding the details of the project and any policies of the client's that Consultants are expected to follow. Policies and details vary from project to project since each client is different. Clients will sometimes require the Consultants to wear badges, identify vest or t-shirt but that varies from client to client.

11. I usually work on in-patient (Hospital) projects. In that setting Consultants may work 12-hour shifts, 7 days per week until a projected concludes. However, if the Consultant is assigned to the OR unit in a Hospital the Consultant sometimes works only Monday-Friday, during scheduled surgeries. Some clients request a Consultant for weekend OR emergencies – but it totally depends on the client's preference. On occasion, I have work for a

project for an “ambulatory” (out-patient) setting. The Consultants schedule for ambulatory projects mirrors the clinic’s hours, which is normally Monday through Friday and can range from 8 hours per day to 12 hours per day depending on how long the clinic is open.

12. Consultants’ job duties also vary from project to project. I have worked as a Team Lead, elbow to elbow Consultant, Proctor and Trainer. The duties for each position varies from project to project. For instance, when I was the Team Lead on the USA, Mobile, Alabama project I mainly provided elbow to elbow support and was a point person for other Consultants, but when I was the Team Lead on the Witchataw, Kansas project had more duties. On the Kansas project, in addition to elbow to elbow support, I was also responsible for flying to the Hospital either every Friday or every other Friday and teaching classes on Saturday and Sunday in the weeks leading up to the go live. Also, the elbow to elbow support duties can vary, depending on client preference. On some projects I have been assigned to a particular floor and provided support to the staff on that unit, while on other projects I have been assigned to a particular physician to train.

13. Each software system has several different modules, which are designed to be used by different departments and types of healthcare professionals. For example, within Cerner there are available functions specific to certain types of medical units, such as FetaLink (specific to mother/baby), FirstNet (specific to ER) and SurgeonNet (specific to OR). Given my RN background and I familiar with these programs and can provide elbow to elbow support for these programs. Some Consultants, however, specialize in the training of Admissions and Front Desk staff support and would not be qualified to provide elbow to elbow support for the functions specific to certain medical units. As such, the elbow to elbow support duties are also different depending on the Consultant’s expertise.

14. Timekeeping practices differ depending on the assigned project. I usually keep track of my time through a Mobile App, but it depends on the client's preference. I have worked on projects for Leidos and I was required to capture my time on ShiftBoard. In order to get on Shiftboard you have to be on-site and using the client's wireless to clock in and out. Additionally, on the USA project in Mobile, AL the client used SpringAhead where we would just enter in a daily total of 12 hours. If a Consultant needed to work more than 12 hours in a day they needed to have prior approval from the client.

This declaration is given voluntarily. I have not been promised any benefit, coerced, or threatened in any manner in exchange for or in relation to this declaration or the information stated in this declaration.

I declare under penalty of perjury under the laws of the State of Alabama and the United States that the foregoing is true and correct.

Dated this 26 day of October, 2017 in Hayden, Alabama.


Kristi Vaughn

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants.

None.

s/ Stacey T. Bradford
OF COUNSEL

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